

STATEMENT OF SAN JOAQUIN COUNTY  
BEFORE THE STATE WATER RESOURCES CONTROL BOARD  
HEARINGS ON THE WATER QUALITY REQUIREMENTS  
FOR THE BAY-DELTA ESTUARY

San Joaquin County recognizes and appreciates the work of the State Water Resources Control Board and others to develop water quality standards for the Bay-Delta estuary. As a significant portion of the San Joaquin-Sacramento Delta lies in the County and many County residents use its waters for consumptive and recreational purposes, we understand the need to balance diverse interests when protecting this valuable resource.

There exists, however, a significant aspect of the proposed standards that does not provide for a fair balance. Specifically, the County is very concerned with the establishment of only one water quality measuring point on the San Joaquin River. The location of this water quality measuring point at Vernalis, below the San Joaquin's confluence with the Stanislaus, and the exclusion of other measuring points, unfairly places the entire burden of meeting San Joaquin River water quality requirements on the Stanislaus and does not fairly allocate that burden to other tributaries of the San Joaquin.

As you know, San Joaquin County has a critically overdrafted groundwater basin in the eastern portion of the County. We are in need of supplemental surface water to combat this overdraft. The Stockton East Water District has a contract with the U.S. Bureau of Reclamation for a supplemental surface water supply from New Melones, but Stockton East has yet to receive a single drop of

water under this contract. The Central San Joaquin Irrigation District also has not received any water under its Bureau contract. The two years in which the Stockton East Water District has had the facilities in place to accept water from New Melones the Bureau has determined that all project yield was needed to meet downstream water quality and Fish & Wildlife requirements in the San Joaquin and Delta. In fact, the Bureau allocated 200,000 acre-feet of the 800,000 acre-feet prescription under the Central Valley Project Improvement Act to the Stanislaus River, an unfair and unjustified act.

Even before the Central Valley Project Improvement Act the Bureau of Reclamation has used releases from New Melones Reservoir to meet its Delta water quality obligations. The San Joaquin River has become the drain for the Bureau's water deliveries to the west side of the Valley.

As you are well aware, the facility to convey away drainage water from lands irrigated on the west side of the Valley with water provided by the Bureau of Reclamation was to be part of the Central Valley Project. This west side drain has not been fully completed. As a result, the salts and other materials present in the drainage water drains into the San Joaquin River. In other words, the San Joaquin River has become the drain for the Bureau's deliveries to the west side of the Valley. The Bureau has used releases from New Melones Reservoir to dilute the salts so that Delta water quality standards are met. Despite knowing about this problem, the Bureau has continued to deliver water to the west side

of the Valley to the detriment of the San Joaquin River and those relying on water from New Melones as a water supply. These activities must be alleviated either through the construction of a west side drain or through stopping the deliveries of water that cause the problems in the San Joaquin.

As the Board is well aware, all of the natural flows of the San Joaquin are stopped at Friant Dam where they are diverted to the Friant-Kern and Madera Canals to irrigate land in Madera, Fresno, Tulare and Kern Counties. The natural flows of the Tuolumne are stopped at New Don Pedro Dam and significant quantities are diverted out of that river and delivered through a pipeline to serve residents of the Bay Area. While the County does not contend that the natural flows of the Tuolumne and San Joaquin should be fully restored, the County does not believe that the burden to make up the difference for the water lost to these diversions be placed entirely on the Stanislaus as it is by the single measuring point.

Placing only one measuring point on the San Joaquin encourages the Bureau to use New Melones as the sole means to regulate water quality standards in the Delta. Placing a water quality measuring point on the San Joaquin below its confluence with the Merced River would more fairly allocate the burden of meeting water quality standards in the San Joaquin and the Delta, and would provide more information as to the conditions in the river so that releases could be optimized. The same salinity standards that exist for Vernalis should exist for this Merced measuring point. Also flow

standards should be established for the Merced measuring point. Contributions of water from the Friant Service Area, San Luis Reservoir and other alternatives should be considered in addressing water quality and flows in the San Joaquin River.

Again, the County commends the State Board and others for tackling one of the State's most pressing and contentious issues, water quality standards in the Bay and the Delta. The County supports the barriers used to improve water quality that are already in the plan and proposed by the South Delta Water Agency. However, the Board must be sensitive to the fact that the Stanislaus River has historically borne the brunt of meeting these standards and that by only placing one measuring point on the San Joaquin, below its confluence with the Stanislaus, encourages this activity to continue. We hope that the Board will establish a second measuring point on the San Joaquin below the Merced and address the issue of drainage from lands on the west side of the Valley that currently are leaching salts into the San Joaquin. We believe that these measures will help improve conditions in the San Joaquin and Delta and will help the residents of this County.